

FOR THE DISTRICT OF NEBRASKA

UNITED STATES OF AMERICA,	)
	)
Plaintiff,	) 8:07CR443
	)
vs.	) MOTION FOR ISSUANCE OF A
	) PROTECTIVE ORDER
SIYAD WARSAME ALI,	)
	)
Defendant.	)

COMES NOW, the Plaintiff, United States of America, by and through Michael P. Norris, Assistant United States Attorney, and respectfully requests the issuance of a Protective Order authorizing the United States to disclose tax return information relating to prospective witnesses to defendant's counsel. In support of this request the United States offers the following:

1. Defendant is charged with preparing false income tax returns in violation of Title 26, United States Code, Section 7206(2);
2. The United States has acquired previous tax returns relative to various witnesses it intends to call at trial. The previous returns were prepared by individuals other than the defendant and bear information that may be relevant.
3. The United States seeks to share this information with defendant's new counsel under restrictions fully set forth in the proposed order submitted herewith.

WHEREFORE, the United States respectfully requests that the Court issue a Protective Order authorizing disclosure of tax return information for the limited use set forth in the proposed order.



Dated this 30<sup>th</sup> day of December, 2008.

UNITED STATES OF AMERICA

JOE W. STECHER.  
United States Attorney

s/Michael P. Norris  
By: MICHAEL P. NORRIS (#17765)  
Assistant United States Attorney  
1620 Dodge Street, Suite 1400  
Omaha, NE 68102  
(402) 661-3700

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**CERTIFICATE OF SERVICE**

I hereby certify that on December 30, 2008, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which sent notification of such filing to the following: Brent Nichols, Attorney at Law

s/Michael P. Norris  
MICHAEL P. NORRIS  
Assistant U.S. Attorney